

**HELEN F. DALTON & ASSOCIATES, P.C.**
ATTORNEYS AT LAW

80-02 Kew Gardens Road, Suite 601, Kew Gardens, NY 11415
Tel. (718) 263-9591 Fax. (718) 263-9598

March 3, 2023

Via ECF:

The Honorable Valerie E. Caproni, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: **Mendez v. Papa Hotel Corp., et al.**
Civil Docket No.: 22-cv-03055 (VEC)

Dear Judge Caproni:

We represent the Plaintiffs in this FLSA action, and we respectfully submit this joint letter motion, together with counsel for the Defendants, to respectfully request an extension of time for the parties to file their Joint Pretrial Order.

On January 13, 2023, Your Honor directed, *inter alia*, that the parties' motions and Pretrial Order shall be due by March 3, 2023. *See* Dkt. No. 23. However, the parties require some additional time to complete same, and anticipate that a one week extension of time to file these documents will be sufficient to do so. If this request is granted, the parties can file their pretrial order by March 10, 2023.

We thank Your Honor for her kind consideration on this matter, and we remain available to provide any additional information.

Respectfully submitted,

Roman Avshalumov
Roman Avshalumov, Esq.

CC:

Sanjay Chaubey
Law Offices of Sanjay Chaubey
19 Stillman Lane
Pleasantville, NY 10570-3901
212-563-3223
Email: chaubeylaw@gmail.com
ATTORNEYS FOR THE DEFENDANTS

Application GRANTED. The parties' deadline to submit their joint pretrial order ("JPTO"), pre-marked trial exhibits, requests to charge, proposed voir dire questions, and any motions in limine is hereby extended from March 3, 2023 until **March 10, 2023**. Any responses to motions in limine are due not later than **March 24, 2023**. Pursuant to the Undersigned's local rules, any future requests for extensions must be made **at least 48 hours** before the deadline.

SO ORDERED.

 03/03/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE